

AO 110 (Rev. 06/09) Subpoena to Testify Before a Grand Jury

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Virginia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Flynn Intel Group  
44 Canal Center Plaza  
Alexandria, VA 22314  
Attn: Custodian of Records for Flynn Intel Group  
c/o Robert Kelner, Covington & Burling, LLP

**YOU ARE COMMANDED** to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. District Court  
401 Courthouse Square  
Alexandria, VA 22314


Date and Time: April 27, 2017 9:30 AM

You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*):

See Attachment.

Date: April 05, 2017

CLERK OF COURT

  
Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the United States attorney, or assistant United States attorney, who requests this subpoena, are:

William M. Sloan, AUSA *WMS*  
Office of the United States Attorney  
Justin W. Williams United States Attorney's Building  
2100 Jamieson Avenue  
Alexandria, Virginia 22314 (703) 299-3700

Flynn Intel Group  
44 Canal Center Plaza  
Alexandria, VA 22314  
Attn: Custodian of Records

c/o Robert K. Kelner  
Covington & Burling LLP  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001-4956  
rkelner@cov.com

ATTACHMENT – Flynn Intel Group

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Please provide any and all documents and physical objects currently in the possession, custody, or control of Flynn Intel Group (“FIG”), including but not limited to contracts, bank records, communications (whether paper or electronic (email)) and attachments, internal memoranda, and any drafts thereof, relating to:

1. Articles of Incorporation;
2. Documentation or charts reflecting organizational structure;
3. Names of all employees, shareholders, members of the Board of Directors, including their title, roles/responsibilities, including contact information;
4. All contracts or written agreements with employees, stockholders, members of the Board of Directors, or members of the laboratory team;
5. Payroll records;
6. Names of all FIG clients, including contact information;
7. All contracts or written agreements between FIG and its clients;
8. All financial holdings/bank accounts/transactions associated with FIG, including corporate business accounts, credit/charge accounts, and any assets and liabilities;
9. Names of third party service providers (including S.G.R. LLC Government Relations and Lobbying, Sphere Consulting, Operational Behavioral Services, White Canvas Group, consultants, editors, public relations firms, and research firms) utilized by FIG or its third party service providers, including contact information;

10. All contracts or written agreements between FIG and third party service providers;
11. Any records, research, payments, invoices, communications, correspondence, or internal memoranda (including related drafts thereof) relating to FIG's work for or interactions with Inovo BV;
12. Any records, research, payments, invoices, communications, correspondence, or internal memoranda (including related drafts thereof) relating to FIG's work for or interactions with Ekim Alptekin;
13. Any records, research, payments, invoices, communications, correspondence, or internal memoranda (including related drafts thereof) relating to FIG's work for or interactions with Ibrahim Kurtulus;
14. Any records, research, payments, invoices, communications, correspondence, or internal memoranda (including related drafts thereof) relating to FIG's work for or interactions with individuals associated with the government of the Republic of Turkey.
15. Any records, research, payments, invoices, communications, correspondence, or internal memoranda (including related drafts thereof) relating to articles (published, unpublished, or contemplated) relating to research conducted for Inovo BV or the Republic of Turkey.

IN LIEU OF APPEARANCE, RECORDS MAY BE SENT TO:

United States Attorney's Office  
Eastern District of Virginia  
ATTN: William M. Sloan, Assistant U.S. Attorney  
2100 Jamieson Ave.  
Alexandria, VA 22314  
Phone: (703) 299-3700  
Fax: (703) 837-8242  
Email: [william.sloan2@usdoj.gov](mailto:william.sloan2@usdoj.gov)